

AO 91 (Rev. 11/11) Criminal Complaint

**UNITED STATES DISTRICT COURT** United States District Court  
Southern District of Texas  
**FILED**  
for the  
Southern District of Texas  
**FEB 01 2023**

United States of America

v.

Nathan Ochsner, Clerk

Case No. 7:23-MJ-00193-1

Jessica ALVARADO (USA / 1991)

Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 31, 2023 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

18 USC § 554

Did knowingly and unlawfully export or attempt to export from the  
 United States, any merchandise, article, or object, to wit: thirty-seven  
 (37) rifles, two (2) handguns, & thirty-eight (38) magazines

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.

Approved by AUSA Peter Brostowin

/s/ Annette C. Allison

*Complainant's signature*

Annette C. Allison, HSI Special Agent

*Printed name and title*

☐ Sworn to telephonically and signed electronically  
 per Fed.R.Cr.4.1

Date: February 1, 2023 at 4:44 p.m.City and state: McAllen, Texas*Judge's signature*

Hon. J. Scott Hacker, United States Magistrate Judge

*Printed name and title*

## ATTACHMENT A

On January 31, 2023, Customs and Border Protection Officers (CBPOs) assigned to the Hidalgo, Texas Port of Entry (POE) conducted an outbound inspection on a Ford F-150, bearing Texas license plates SMJ9589 (hereinafter F-150) while attempting to depart the United States and enter Mexico.

Upon contacting the driver, later identified as Jessica ALVARADO (hereinafter referred to as ALVARADO), a United States Citizen, CBPOs obtained a negative oral declaration from ALVARADO for monetary instruments in excess of \$10,000 United States Dollars, firearms, and ammunition. During this outbound inspection, ALVARADO was referred by CBPOs to secondary inspection after noticing the bed of the pickup truck was abnormally elevated. ALVARADO was escorted for further inspection.

Homeland Security Investigations (HSI), Special Agent (SA) responded to the Hidalgo POE to assist in the investigation. HSI SA along with a CBPO, and Alcohol, Tobacco, and Firearms (ATF) SAs conducted a post Miranda interview of ALVARADO regarding her participation in this attempt to unlawfully export firearms from the United States into Mexico.

ALVARADO initially stated the F-150 was left at her residence, with instructions to transport the vehicle to Mexico. ALVARADO later reported she drove the F-150 from Houston, Texas, down to her residence in San Juan, Texas on January 30, 2023, with the intention of delivering the F-150 to an unknown male in Mexico. ALVARADO reported she suspected she was transporting illegal goods to Mexico in the F150, specifically "arms or money." ALVARADO stated that she did not possess a license to export firearms from the United States into Mexico and admitted knowledge that it was illegal to smuggle firearms from the United States into Mexico. A total of (33) AK-47s, (3) AR-15s, (1) .22 Long rifle, (2) .45 Caliber Handguns, and (38) magazines were extracted from the bed of the F-150 truck that ALVARADO was attempting to smuggle into Mexico.

During a subsequent consensual search of the defendants residence, two firearms, approximately \$10,000 in US Currency, and narcotics were identified and seized by HSI SA's and San Juan Police Department.